UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS
UNITED STATES OF AMERICA V. CRIMINAL NO. CONSTREY TANGON
MOTION FOR DETENTION HEARING
The United States moves for pretrial detention of defendant,
pursuant to 18 U.S.C. Section 3142(e) and (f).
1. Eligibility of Case. This case is eligible for a
detention order because it involves (check all that apply): '
Crime of violence (18 U.S.C. Section 3156)
Maximum sentence life imprisonment or death
10 plus years drug offense
Felony, with two prior convictions in above
categories
Serious risk defendant will flee
Serious risk of obstruction of justice
2. Reason for Detention. The court should detain defendant
because there are no conditions of release which will reasonably
assure (check one or both):
Defendant's appearance as required
Safety of any other person and the community
3. Rebuttable Presumption. The United States (will, will
not) invoke the rebuttable presumption against defendant under
Section 3142(e). (If yes) The presumption applies because (check

one or both):

Probable cause to believe defendant committed 10
plus year drug offense or firearms offense, 18 U.S.C. Section
924(c)
Previous conviction for "eligible" offense
committed while on pretrial bond
4. Time for Detention Hearing. The United States requests,
the court conduct the detention hearing,
At first appearance
After continuance of 3 days (not more than 3)
5. Witnesses. The United States intends to call the
following witnesses: Spr. ng Field Pol. 20 Natertine Sean Conido
The amount of time for direct examination of these witnesses
is estimated to be: one-half hour.
6. Other Matters.
DATED this 7 day of Sawary, 2005.
Assistant United States Attorney